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October 25, 2022

VIA ECF

Honorable Robert Kugler, U.S.D.J.
U.S. District Court - District of New Jersey
Mitchell S. Cohen Building & US
Courthouse
1 John F. Gerry Plaza, Courtroom 4D
4th and Cooper Streets
Camden, New Jersey 08101

Honorable Thomas I. Vanaskie (Ret.)
Special Master
Stevens & Lee
1500 Market St., East Tower, Suite 1800
Philadelphia, Pennsylvania 19103-7360

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***
Case No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Kugler and Judge Vanaskie:

Please accept this letter on behalf of Plaintiffs in advance of the October 27, 2022 case management conference.

1. Proposed Briefing Schedule for Motion to Seal

The Parties have met and conferred, and are proposing to file opening briefs related to motions to seal the class certification briefing on December 2, 2022, with any response briefs being due on December 19, 2022.

Given the large quantity of documents involved, the Parties' intention is to submit briefing only on the documents that remain in dispute. Once the Court has issued rulings on the disputed

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documents, the Parties will then file public versions of exhibits with stepped-down confidentiality on the docket in addition to new versions of any briefs which were previously filed with redactions in accordance with the Court's determination on confidentiality of the underlying documents subject to the briefing.

2. Losartan/Irbesartan Plaintiff Fact Sheets

Defendants sent copies of the proposed losartan/irbesartan PFSs to Plaintiffs on Friday, October 21, 2022, and requested that the Parties meet and confer. Plaintiffs responded on the same day, requesting that Defendants provide redlines to the original valsartan PFS for each version of the PFS (PI, TPP, Economic loss, and medical monitoring) in advance of a meet and confer. Defendants responded on Monday evening, October 24, 2022, that they could not provide redlines. Plaintiffs have proposed times to meet and confer and anticipate this will occur shortly. Any substantive matters raised by Defendants' papers regarding the losartan/irbesartan PFSs are simply not ripe for the Court's consideration.

3. Case-specific Discovery Requests for TPP Trial

As the Court directed, Plaintiffs submitted their briefing on the disputed discovery requests. (See [ECF 2181](#)). Plaintiffs are continuing to meet and confer with Defendants to work on narrowing the issues. Plaintiffs will be prepared to further address this issue at the case management conference.

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4. PFS Deficiencies and Orders to Show Cause

Plaintiffs will be prepared to address this issue during the case management conference.

Respectfully,



ADAM M. SLATER

Cc: All counsel of record (via ECF)